

## REMARKS

Claims 1-3, 8-29, 34-53, 55-65 and 67-74 are pending in the application.

Claims 1-15, 27-41, 54 and 61-74 are canceled without prejudice.

Claims 20, 22, 23, 46, 48, 49, 53, 57 and 60 are currently amended, and new claims 75-81 have been added. No new matter has been introduced by virtue of the claim revisions and additions. Examiner's reconsideration of the rejections and objections set forth in the Office Action is respectfully requested in view of the above amendments and the following remarks.

### Claim Objections

Various claim objections were asserted on pages 2-4 of the Office Action. Applicants have amended the claims to address virtually all of the claims objections for the pending claims. However, Applicants respectfully traverse the objections to claims 16, 42 and 53 with respect to Examiner's request that the claims be amended to include the term "web pages" as suggested. The claimed inventions are not necessarily limited to "Web pages". Accordingly, withdrawal of the claim objections is respectfully requested.

### Claim Rejections- 35 U.S.C. § 112

Claims 3, 29 and 63 stand rejected under 35 U.S.C. § 112, first paragraph, for the reasons set forth on pages 5-6 of the Office Action. This rejection is moot since claims 3, 29 and 63 have been canceled.

Claims 23, 49 and 63 stand rejected under 35 U.S.C. § 112, second paragraph, for the reasons set forth on pages 6-7 of the Office Action. The rejection is moot with regard to canceled claim 63. However, claims 23 and 49 have been amended in a sincere effort to more clearly phrase the claimed subject matter. Accordingly, withdrawal of all claim rejections under 35 U.S.C. § 112 is respectfully requested.

## Claim Rejections- 35 U.S.C. § 102

(i) Claims 1-3, 8-15, 27-29, 34-41, 61-64 and 67-74 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,256,712 to Challenger, et al, for the reasons set forth on pages 7-12 of the Office Action. This rejection is moot since claims 1-3, 8-15, 27-29, 34-41, 61-64 and 67-74 have been canceled. Accordingly, withdrawal of the anticipation rejections based on Challenger is respectfully requested.

(ii) Claims 16, 17, 42 and 43 stand rejected under 35 U.S.C. 102(e) as being anticipated by the publication by Darnell, et al, for the reasons set forth on pages 12-14 of the Office Action. Applicants respectfully traverse the rejection and contend that at the very minimum, claims 16 and 42 are not anticipated by Darnell.

More specifically, Darnell does not disclose or suggest *a method for publishing a plurality of objects* including, for example, *partitioning at least some of a plurality of objects into a plurality of groups such that if two compound objects are constructed from at least one common changed fragment, then the compound objects are placed in a same group, and publishing all objects belonging to a same group together*. Indeed, it is respectfully submitted that Examiner's general reliance on pages 117-123 of Darnell as disclosing these claim elements is misplaced.

In particular, any teaching by Darnell that may be even remotely construed as relating to "publishing" appears to be an "update process" on page 122, which discloses nothing more than an update process which is performed by searching through pages of a selected web site for library items, and updating any items that are found with current contents from the library. In this regard, Darnell does not disclose or even remotely suggest *partitioning objects into groups*, much less *publishing objects in a same group together*.

In fact, with regard to the rejection of claims 16 and 42 based on Darnell, other than a general citation to the entire Darnell reference (pages 117-123) and bald, unsupported assertions as to the teachings of Darnell, there is no citation whatsoever in the Office Action to specific portions of Darnell to support the assertions on page 13 of the Office Action, for example.

Accordingly, claims 16 and 42 are patentably distinct and patentable over Darnell. Claims 17 and 43 are patentably distinct and patentable over Darnell at least by virtue of their dependence from respective base claims 16 and 42. Accordingly, withdrawal of the anticipation rejections based on Darnell is respectfully requested.

#### **Claim Rejections- 35 U.S.C. § 103**

The following claim rejections were asserted under 35 U.S.C. § 103(a):

- (i) Claims 18, 19, 44 and 45 stand rejected as being unpatentable over Darnell, for the reasons set forth on pages 14-15 of the Office Action;
- (ii) Claims 20-22 and 46-48 stand rejected as being unpatentable over Darnell in view of U.S. patent No. 6,199,082 to Ferrel, for the reasons set forth on pages 15-18 of the Office Action; and
- (iii) Claims 23-26, 49-53 and 55-60 stand rejected as being unpatentable over Darnell, in view of Ferrel and further in view of Cormen, for the reasons set forth on pages 18-30 of the Office Action.

The above obviousness rejections (i) and (ii) are based, in part, on Examiner's contention that Darnell discloses all the elements of claims 16 and 42. However, as noted above, Darnell clearly does not disclose or even remotely suggest elements of claims 16 and 42. Thus, the obviousness rejections (i) and (ii) appear to be legally deficient on their face because it has not even been sufficiently demonstrated how Darnell alone, or in combination with Ferrel, even

discloses the elements of claims 16 or 42.

Moreover, with respect to the above obviousness rejection (iii) for claims 23-26 and 49-52 (which depend directly or indirectly from respective base claims 16 or 42), the obviousness rejections appear to be legally deficient on their face because it has not even been sufficiently demonstrated how Darnell alone, or in combination with Ferrel and/or Cormen even discloses the elements of claims 16 or 42.

Moreover, with regard to claims 53 and 55-60, at the very least, the combination of Darnell, Ferrel and Cormen does not disclose or suggest the invention of claim 53. For instance, the cited combination does not disclose or suggest, e.g., *constructing at least one graph, the at least one graph including nodes representing at least some of the plurality of objects and edges for connecting nodes having relationships, at least some of the edges being derived from at least one consistency constraint*, as essentially claimed in claim 53

Examiner relies on Ferrel as disclosing the above claim elements. It is respectfully submitted, however, that Examiner's reliance on Ferrel in this regard is misplaced. Examiner relies solely on two lines (Col. 9, lines 30-31) of Ferrel, which states that the "natural way of storing related and ordered objects is in a data structure, such as an acyclic graph". This teaching does not disclose or suggest a graph having nodes and edges, wherein at least some of the edges being derived from at least one consistency constraint. Although acyclic graphs may be known to have ordered (directed) edges, this is not the same as edges derived from consistency constraints, as claimed.

Accordingly, for at least the above reasons, the combination of Darnell, Ferrel and Cormen is legally deficient to establish a *prima facie* case of obviousness against claim 53. Therefore, claim 53 and all pending claims that depend from claim 53, are believed to be

patentable and non-obvious over at least the cited combination. Moreover, new claims 75-81 are believed to be patentable over the cited combination at least for the same reasons given for claim 53.

In view of the foregoing amendments and remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,



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